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OF COUNSEL:

**OPPENHEIM + ZEBRAK LLP**

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*Attorneys for Plaintiff Pearson Education, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

PEARSON EDUCATION, INC.,	)	
	)	
Plaintiff,	)	<b>Case No. 2:21-cv-16866-MEF-AME</b>
	)	
v.	)	
	)	
CHEGG, INC.,	)	<b>CONSENT ORDER GRANTING</b>
	)	<b>PLAINTIFF'S <i>PRO HAC VICE</i></b>
	)	<b>APPLICATION</b>
Defendant.	)	<del><b>PROPOSED</b></del>

The above matter has been opened to the Court by Fox Rothschild LLP ("[Applicant](#)"), attorneys for Plaintiff Pearson Education, Inc., for an Order granting the *pro hac vice* admission of Jeff Kane, Esq., of the law firm of Oppenheim + Zebtrak LLP. Defendant Chegg, Inc. consents to Plaintiff's request. The Court has considered the application. For good cause shown:

**IT IS** on this 9th day of August, 2024,

**ORDERED** that Jeff Kane, Esq., a member in good standing of, *inter alia*, the Bars of Maryland and District of Columbia, is hereby admitted *pro hac vice* to appear and participate as co-

counsel for Plaintiff in this matter pursuant to Local Civil Rule 101.1 of the United States District Court for the District of New Jersey; and

**IT IS FURTHER ORDERED** that the Applicant shall (a) be attorneys of record in this case in accordance with L. Civ. R. 101.1(c); (b) be served all papers in this action and such service shall be deemed sufficient service upon Attorney Name, Esq.; (c) sign (or arrange for an attorney admitted to practice in the United States District Court for the District of New Jersey to sign) all pleadings, briefs, and other papers submitted to this Court; (d) appear at all proceedings unless expressly excused by the Court; and (e) be responsible for the conduct of Attorney Name, Esq. in this matter; and

**IT IS FURTHER ORDERED** that Jeff Kane, Esq. shall make all required payments to the New Jersey Lawyers' Fund for Client Protection (the "Fund") in accordance with Local Civil Rule 101.1(c)(2) and New Jersey Court Rule 1:28-2(a), and continue to make payment, or cause payment to be made, for each calendar year in which he continues to represent Plaintiff. Moreover, in accordance with New Jersey Court Rule 1:21-2, pro hac vice counsel shall provide a copy of this Order to the Fund with counsel's submission of all such payments; and

**IT IS FURTHER ORDERED** that, if he has not already done so in connection with this action, Jeff Kane, Esq. shall pay \$250.00 to the Clerk of the United States District Court for the District of New Jersey for admission pro hac vice in accordance with L. Civ. R. 101.1(c)(3); and

**IT IS FURTHER ORDERED** Jeff Kane, Esq. shall be bound by the General and Admiralty Rules of the United States District Court for the District of New Jersey, including, but not limited to, the provisions of Local Civil Rule 103.1, "Judicial Ethics and Professional Responsibility," and Local Civil Rule 104.1 "Discipline of Attorneys;" and

**IT IS FURTHER ORDERED** that Jeff Kane, Esq., shall notify this Court immediately of any disciplinary charges brought against them in the Bar of any other Court; and

**IT IS FURTHER ORDERED** that Jeff Kane, Esq. shall be deemed to have agreed not to take a fee in any tort case in excess of the New Jersey State Contingency Fee Rule, Rule 1:21-7, as amended; and

**IT IS FURTHER ORDERED** that Fox Rothschild LLP may file a request, the form of which is available at the Court's website, with the Clerk of the Court for pro hac vice counsel to receive electronic notifications in this matter.

/s/ André M. Espinosa  
ANDRÉ M. ESPINOSA  
United States Magistrate Judge